

REMARKS

This application has been carefully reviewed in light of the Office Action dated May 22, 2006. Claims 1 to 62 remain in the application, of which Claims 1, 19, 25, 37, 49, 61 and 62 are independent. Reconsideration and further examination are respectfully requested.

Claim 62 was objected to for an informality that has been attend to by amendment. Withdrawal of the objection is respectfully requested,

Claims 61 and 62 were rejected under 35 U.S.C. § 101. Without conceding the correctness of the rejections, the claims have been amended to make it even clearer that the claimed statutory subject matter is directed to a computer readable storage medium. Reconsideration and withdrawal of the rejections are respectfully requested.

Claims 1 to 12 and 17 to 62 were rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 6,574,655 (Libert) in view of U.S. Patent No. 6,711,586 (Wells), and Claims 13 to 16 were rejected under § 103(a) over Libert in view of Wells and further in view of U.S. Patent No. 5,819,092 (Ferguson). The rejections are respectfully traversed and it is requested that the Examiner reconsider and withdraw the rejections in light of the following comments.

The present invention relates to providing the ability to access *descriptions* of multimedia items from a plurality of content providers. According to the invention, a server receives a search request for descriptions of, for example, multimedia items. The multimedia items and their corresponding descriptions may be stored in separate locations, with the metadata server storing the descriptions. The server interprets the search request, and accesses the stored descriptions in accordance with the search request. When the

information is accessed, the metadata server also formulates a return search request to the metadata server for further descriptions. Thus, if there are subcategories within the category of the original search request, the metadata server, knowing those subcategories, can formulate an appropriate return search request so that information contained within those subcategories can be readily accessed if a user performs an operation to issue a further search request. Once the return search request has been formulated by the metadata server, the metadata server formats the accessed descriptions to include at least one link that represents the return search request, and sends the formatted description to the requestor.

With specific reference to the claims, Claim 1 is directed to a system for facilitating access to descriptions of multimedia items from a plurality of content providers of the items, wherein information required by the descriptions is stored in corresponding metadata collections associated with the multimedia items, the system comprising (a) a metadata server associated with each the content provider and operable as a description-generating process for communicating with one or more description-receiving processes, each the metadata server being configured, for each the content provider, to perform the steps of (i) receiving a search request for the descriptions from one of the description-receiving processes in a predetermined search request format, (ii) interpreting the received search request according to the predetermined search request format, (iii) accessing the information about the multimedia items in the metadata collection of the content provider in response to the interpreted search request, (iv) formulating from the information at least one return search request to the metadata server for further descriptions, each return search request being in the predetermined search request format, (v) formatting the accessed

information including links representing the at least one return search request as a description according to a predetermined scheme, and (vi) sending the formatted description to the description-receiving process, and (b) at least one the description-receiving process accessible to and operable by potential customers of the content providers and providing the potential customers with a single user interface to access descriptions of multimedia items generated from the multiple metadata servers.

Independent Claims 19 and 25 are system claims that include features substantially corresponding to Claim 1, while independent Claims 37 and 49 are directed to a metadata/information server, and independent Claims 61 and 62 are computer readable storage medium claims that substantially correspond to Claim 37 and 49, respectively.

The applied art of Libert, Wells and Ferguson, alone or in any permissible combination, is not seen to disclose or to suggest the features of Claims 1, 19, 25, 37, 49, 61 and 62. In particular, the applied art is not seen to disclose or to suggest at least the feature of a metadata server i) formulating, information accessed in response to a received search request for descriptions of multimedia items/structured information, at least one return search request to the metadata server for further descriptions, each return search request being in a predetermined search request format, ii) formatting the accessed information including links representing the at least one return search request as a description according to a predetermined scheme, and iii) sending the formatted description to a description-receiving process.

The Office Action more or less admits that Libert is not seen to disclose various features of the invention. Specifically, the Office Action admits that Libert fails to disclose the claimed feature of formulating the at least one return search request to the

metadata server for further descriptions. However, the Office Action took the position that Wells allegedly discloses the features missing from Libert and in support of the alleged disclosure, the Office Action relied on column 1, lines 18 to 49 of Wells.

As understood by Applicants, the cited portion of Wells describes “index-like search engines” where indexes are used to transmit information to a client computer in the form of a Web page. The indexes comprise categories, such as arts, sports, finance, etc. When a user selects a category, one or more sub-categories are transmitted to the client computer in a second Web page. Those skilled in the art would have readily understood the foregoing process to constitute “browsing”. That is, the first Web page is accessed by entering a URL into a web browser. When the URL associated with a category depicted in the first Web page is selected by the user, it merely results in the web browser obtaining the second Web page corresponding to the selected URL, whereby the second Web page is downloaded to the client computer. The second Web page corresponding to the URL including in the first Web page already exists at the time the URL for the first Web page is entered into the browser. If the web page does not exist, then the web browser would merely indicate that the selected URL could not be found. Thus, the foregoing process is clearly understood to constitute “browsing”.

In contrast, the present invention is related to “searching” for descriptions of multimedia items. As claimed, when a user issues a search request, the server formulates a return search request for further descriptions, and then formats the searched information including links representing the at least on return search requests. Thus, unlike Wells, the formulated return search requests do not exist at the time the first search request is submitted, but rather, are formulated based on the first search request. Additionally, the

links included in the first web page of Wells exist at the time the URL is entered for downloading the web page (i.e., the web page is already created and includes the hypertext links), whereas, in the present invention, the links representing the return search requests are formatted only after the first search request has been received and processed. Those skilled in the art readily understand the foregoing process to constitute “searching” and not “browsing” as described in Wells. Thus, Wells’ process is clearly distinguishable from the present invention.

In view of the foregoing, the proposed combination of Libert and Wells would not have resulted in at least the features of a metadata server i) formulating, information accessed in response to a received search request for descriptions of multimedia items/structured information, at least one return search request to the metadata server for further descriptions, each return search request being in a predetermined search request format, ii) formatting the accessed information including links representing the at least one return search request as a description according to a predetermined scheme, and iii) sending the formatted description to a description-receiving process.

Ferguson has been studied but is not seen to disclose anything that, when combined with Libert and/or Wells, would have resulted in at least the features of a metadata server i) formulating, information accessed in response to a received search request for descriptions of multimedia items/structured information, at least one return search request to the metadata server for further descriptions, each return search request being in a predetermined search request format, ii) formatting the accessed information including links representing the at least one return search request as a description according

to a predetermined scheme, and iii) sending the formatted description to a description-receiving process.

In view of the foregoing deficiencies of the applied art, independent Claims 1, 19, 25, 37, 49, 61 and 62, as well as the claims dependent therefrom, are believed to be allowable.

No other matters having been raised, the entire application is believed to be in condition for allowance and such action is respectfully requested at the Examiner's earliest convenience.

Applicants' undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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